REMARKS

Claims 1-4, 6-14, 16-23 and 25-30 are pending in the application.

Claims 1-4, 6-14, 16-23 and 25-30 have been rejected.

Claims 1, 11, 21, and 28 have been amended.

Rejection of Claims under 35 U.S.C. § 102(e)

Claims 1-4, 6-14, 16-23 and 25-30 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2002/0188711 listing Meyer, et al. ("Meyer") as inventors. Applicants respectfully traverse this rejection. Applicants respectfully submit that the arguments presented below with respect to independent claim 1 are generally applicable to independent claims 11, 21, and 28, as independent claims 11, 21, and 28 generally require the same disputed limitations of claim 1. Independent claim 1 has been amended to recite:

A method comprising:
    detecting a failure of a first virtualization device of a storage area network
        interconnect, wherein
        said storage area network interconnect is coupled to a metadata host,
        said metadata host is configured to maintain metadata associated with said
            first virtualization device, said metadata host is configured to
            monitor a heartbeat signal from a plurality of virtualization
            devices, and
        said first virtualization device is associated with a unique interconnect
            device identifier, , wherein
            the unique interconnect device identifier is sufficient to identify a
                virtualization device with which the unique interconnect
                device identifier is associated, and
            the unique interconnect device identifier is configured to identify
                the virtualization device as a target of a data transfer
                request; and
    associating said unique interconnect device identifier with a second virtualization
        device of said storage area network interconnect in response to said
        detecting, wherein said associating comprises modifying said metadata.

Applicants respectfully submit that the cited passages of Meyer do not disclose each element of independent claim 1. Specifically, the cited passages of Meyer fail to

teach at least the following features recited in independent claim 1: "said first virtualization device is associated with a unique interconnect device identifier, wherein the unique interconnect device identifier is sufficient to identify a virtualization device with which the unique interconnect device identifier is associated, and the unique interconnect device identifier is configured to identify the virtualization device as a target of a data transfer request."

The Office Action compares the claimed unique interconnect device identifier with the designated role of "primary" or "backup." *See* Office Action, p. 2 (citing Meyer, p. 13, ¶ 0334) and p. 12 (citing Meyer, p. 8, ¶ 0163, 165-168). Applicants respectfully submit that designating the role of a device as primary or backup is not comparable to associating the device with a unique interconnect device identifier. The distinction between the two is further supported by the amendment to claim 1 which recites that "the unique interconnect device identifier is configured to identify the virtualization device as a target of a data transfer request."

In Meyer's system, the purpose of designating one device as a primary is to designate which device is to perform failover management services and duties. *See, e.g.,* Meyer, ¶ 0162. However, as shown by the following quote from Meyer, merely being designated as the primary is insufficient to identify the primary as a recipient of a data transport request: "I/O requests can go through any VSC or LC in the collection. As such, the I/O Path model works independent of the Management model and treats all members as active, or primary." *Id.* Therefore, identifying a device as primary is irrelevant to and has no effect on the device's handling of data transfer requests. Further, Meyer also discloses that members of a failover set must have node and port world wide names, and these names must be assigned and validated. *See, e.g.,* Meyer, ¶¶ 0248 and 597. Thus, Applicants respectfully submit that Meyer's designation of primary or backup role is insufficient to identify a first virtualization device as a target of a data transfer request, and is thus not comparable to the limitations of claim 1.

For at least the foregoing reasons, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejections to claims 1, 11, 21, and 28, and an indication of the allowability of same. Applicants further submit that claims 2-4, 6-10,

12-14, 16-20, 22-23, 25-27, and 29-31 are similarly allowable, at least by virtue of depending from allowable base claims.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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